

Exhibit 8

From: [Bonner, Kelly](#)
To: [Adam Slater](#); [Cheryll Calderon](#); [Christopher Geddis](#)
Cc: [Goldberg, Seth A.](#); [Priselac, Jessica](#); [Hill, Coleen W.](#)
Subject: RE: John C. Iozzia - 01.20.21 - Valsartan, Losartan, and Irbesartan Products Liability Litigation MDL No. 2875 (FINAL Transcript & Exhibits)
Date: Thursday, March 4, 2021 5:59:18 PM

Adam,

You are going to have to give us some rationale for rushing this issue before the Court when our reply brief on the same issue will not even be filed until Monday.

Plaintiffs have not articulated how the ZHP Parties' confidentiality designations in any way prejudice Plaintiffs. Plaintiffs can use the designated documents in deposing ZHP party witnesses, and the Court can resolve the issue, and any outstanding issues involving designated documents, by reviewing the challenged documents in camera. Nor is there is any risk of harm to any individual because the drugs have been recalled.

What you are suggesting completely short circuits the Protective Order, which provides a mechanism for meeting and conferring to resolve these issues amicably so that the Court won't have to weigh in prematurely or unnecessarily.

Your statement that Plaintiffs "assume [we] are not going to reconsider any of [our] designations" is just wrong, as we have repeatedly tried to meet and confer in good faith. Further, we have repeatedly requested that Plaintiffs identify specific challenges and explain how they relate to public health issues. Rather than answering, Plaintiffs have repeatedly ignored our requests.

In contrast to the absence of any prejudice to Plaintiffs, and where the documents at issue contain the ZHP Parties' highly sensitive and proprietary information, and will result in exposure to all of their direct competitors, this issue is of the highest of the importance to the ZHP Parties and should be resolved pursuant to the Court-ordered procedure.

As for any urgency in filing on this issue for next week's conference, as you recall, the ZHP Parties have already filed on this issue, per your refusal to extend the meet and confer process any longer in order to discuss redactions, allow the ZHP Parties the opportunity to file an omnibus sealing motion addressing Plaintiffs' confidentiality challenges, or wait for the Court's order clarifying these issues.

These issues are far from ripe, and your repeated efforts to force these issues to a head are inefficient, and frankly insincere given the total lack of prejudice to Plaintiffs.

I am happy to meet and confer early next week.

Thank you,
Kelly

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From: Adam Slater <ASlater@mazieslater.com>

Sent: Thursday, March 4, 2021 3:06 PM

To: Bonner, Kelly <KABonner@duanemorris.com>; Cheryll Calderon <ccalderon@mazieslater.com>; Christopher Geddis <CGeddis@mazieslater.com>

Cc: Goldberg, Seth A. <SAGoldberg@duanemorris.com>; Priselac, Jessica <JPriselac@duanemorris.com>; Hill, Coleen W. <CWHill@duanemorris.com>

Subject: RE: John C. Iozzia - 01.20.21 - Valsartan, Losartan, and Irbesartan Products Liability Litigation MDL No. 2875 (FINAL Transcript & Exhibits)

Hi Kelly – perhaps someone else on your team can speak to us tomorrow, or even Saturday. We assume you are not going to reconsider any of your designations, but want to have the opportunity to meet and confer before we file on this for next week's conference. Because this issues are being handled now, we really don't want to wait, we simply don't have time.

Please advise.

Adam Slater

From: Bonner, Kelly <KABonner@duanemorris.com>

Sent: Thursday, March 04, 2021 11:43 AM

To: Cheryll Calderon <ccalderon@mazieslater.com>; Adam Slater <ASlater@mazieslater.com>; Christopher Geddis <CGeddis@mazieslater.com>

Cc: Goldberg, Seth A. <SAGoldberg@duanemorris.com>; Priselac, Jessica <JPriselac@duanemorris.com>; Hill, Coleen W. <CWHill@duanemorris.com>

Subject: RE: John C. Iozzia - 01.20.21 - Valsartan, Losartan, and Irbesartan Products Liability Litigation MDL No. 2875 (FINAL Transcript & Exhibits)

Hi Cheryll,

Unfortunately, I'm jammed up on another filing today. We can do early next week? It may be better to meet and confer on Tuesday. Since we intend to reply to Plaintiffs' response to the sealing motion on Monday, our reply should inform the substance of our discussions. Let me know if you think otherwise.

In the meantime, in order to make the meet and confer productive, please provide us with specific challenges to each of Plaintiffs' challenged designations, as well as an understanding of exactly how Plaintiffs believe the challenged documents fall within a public health exception.

Thanks,
Kelly

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From: Cheryll Calderon <ccalderon@mazieslater.com>**Sent:** Wednesday, March 3, 2021 10:52 AM**To:** Bonner, Kelly <KABonner@duanemorris.com>; Adam Slater <ASlater@mazieslater.com>;
Christopher Geddis <CGeddis@mazieslater.com>**Cc:** Goldberg, Seth A. <SAGoldberg@duanemorris.com>; Priselac, Jessica
<JPriselac@duanemorris.com>; Hill, Coleen W. <CWHill@duanemorris.com>**Subject:** RE: John C. Iozzia - 01.20.21 - Valsartan, Losartan, and Irbesartan Products Liability Litigation
MDL No. 2875 (FINAL Transcript & Exhibits)

How about tomorrow after 5:30?

Cheryll A. Calderon, Esq.

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From: Bonner, Kelly <KABonner@duanemorris.com>

Sent: Wednesday, March 3, 2021 10:47 AM

To: Cheryll Calderon <ccalderon@mazieslater.com>; Adam Slater <ASlater@mazieslater.com>; Christopher Geddis <CGeddis@mazieslater.com>

Cc: Goldberg, Seth A. <SAGoldberg@duanemorris.com>; Priselac, Jessica <JPriselac@duanemorris.com>; Hill, Coleen W. <CWHill@duanemorris.com>

Subject: RE: John C. Iozzia - 01.20.21 - Valsartan, Losartan, and Irbesartan Products Liability Litigation MDL No. 2875 (FINAL Transcript & Exhibits)

Hi Cheryl,

Thank you for your suggestion; however, I'm not available on Friday.

Please let me know another time that works to discuss confidentiality issues.

Thanks,
Kelly

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From: Cheryll Calderon <ccalderon@mazieslater.com>

Sent: Wednesday, March 3, 2021 10:42 AM

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Cc: Goldberg, Seth A. <SAGoldberg@duanemorris.com>; Priselac, Jessica <JPriselac@duanemorris.com>; Hill, Coleen W. <CWHill@duanemorris.com>

Subject: RE: John C. Iozzia - 01.20.21 - Valsartan, Losartan, and Irbesartan Products Liability Litigation MDL No. 2875 (FINAL Transcript & Exhibits)

Hi Kelly,

We are meeting and conferring with your colleagues on Friday at 10am regarding privilege and state secret logs. Can we also discuss this issue at that time?

Cheryll

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From: Bonner, Kelly <KABonner@duanemorris.com>

Sent: Friday, February 26, 2021 11:31 AM

To: Cheryll Calderon <ccalderon@mazieslater.com>; Adam Slater <ASlater@mazieslater.com>; Christopher Geddis <CGeddis@mazieslater.com>

Cc: Goldberg, Seth A. <SAGoldberg@duanemorris.com>; Priselac, Jessica <JPriselac@duanemorris.com>; Hill, Coleen W. <CWHill@duanemorris.com>

Subject: RE: John C. Iozzia - 01.20.21 - Valsartan, Losartan, and Irbesartan Products Liability Litigation MDL No. 2875 (FINAL Transcript & Exhibits)

Hi Cheryll,

If Plaintiffs don't want to wait for the Court's order on the sealing motion, then we're happy to meet and confer, especially to avoid tying up the Court with duplicative motion practice. Please let us know times next week that work for Plaintiffs.

In order to meet and confer in good faith, please provide us with specific challenges to each of the designations, rather than a blanket assertion that the designations do not reach the level of proprietary information that would result in significant harm to the ZHP Parties.

Thanks,
Kelly

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From: Cheryll Calderon <ccalderon@mazieslater.com>

Sent: Friday, February 26, 2021 10:52 AM

To: Bonner, Kelly <KABonner@duanemorris.com>; Adam Slater <ASlater@mazieslater.com>;
Christopher Geddis <CGeddis@mazieslater.com>

Cc: Goldberg, Seth A. <SAGoldberg@duanemorris.com>; Priselac, Jessica
<JPriselac@duanemorris.com>; Hill, Coleen W. <CWHill@duanemorris.com>

Subject: RE: John C. Iozzia - 01.20.21 - Valsartan, Losartan, and Irbesartan Products Liability Litigation
MDL No. 2875 (FINAL Transcript & Exhibits)

Hi Kelly:

In order to keep the case moving we would prefer to have the time frames in the Protective Order apply. We do not agree to stay or suspend the time periods. As it is your option to request a meet and confer, and you do not appear to be asking for that, the time period for you to file a motion to maintain the Iozzia designations is now applicable.

Cheryll

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From: Bonner, Kelly <KABonner@duanemorris.com>

Sent: Thursday, February 25, 2021 9:43 AM

To: Adam Slater <ASlater@mazieslater.com>; Cheryll Calderon <ccalderon@mazieslater.com>; Christopher Geddis <CGeddis@mazieslater.com>

Cc: Goldberg, Seth A. <SAGoldberg@duanemorris.com>; Priselac, Jessica <JPriselac@duanemorris.com>; Hill, Coleen W. <CWHill@duanemorris.com>

Subject: FW: John C. Iozzia - 01.20.21 - Valsartan, Losartan, and Irbesartan Products Liability Litigation MDL No. 2875 (FINAL Transcript & Exhibits)

Hi Adam,

I'm Kelly Bonner and I'll be running point on any confidentiality issues going forward.

The ZHP Parties stand by their designations in connection with the deposition of John Iozzia pending the outcome of our sealing motion before the Court.

As I understand, you advised that the ZHP Parties should file the motion to seal following the parties' previous meet and confers, and we agree that it makes sense to wait until the Court issues an order and provides some clarity.

We've compiled a list of the documents in dispute, which we can send to you, and revisit once the Court rules on the sealing motion. Until then, any existing confidentiality designations should remain in place, and treated in accordance with the Protective Order.

If you think this issue would benefit from further discussion prior to the Court's entry of an Order, we'd be happy to schedule a call. Please let us know some times that work for you, and

Thanks,
Kelly

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From: Adam Slater <ASlater@mazieslater.com>

Sent: Monday, February 22, 2021 2:05 PM

To: Hill, Coleen W. <CWHill@duanemorris.com>; 'KMartello@golkow.com'

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Cc: 'Production@golkow.com' <Production@golkow.com>; 'Finals@golkow.com'

<Finals@golkow.com>; Priselac, Jessica <JPriselac@duanemorris.com>; Goldberg, Seth A.

<SAGoldberg@duanemorris.com>; Bonner, Kelly <KABonner@duanemorris.com>; Cheryll Calderon

<ccalderon@mazieslater.com>; Christopher Geddis <CGeddis@mazieslater.com>;

'valpec@kirtlandpackard.com' <valpec@kirtlandpackard.com>

Subject: Re: John C. Iozzia - 01.20.21 - Valsartan, Losartan, and Irbesartan Products Liability Litigation MDL No. 2875 (FINAL Transcript & Exhibits)

Colleen:

Plaintiffs have reviewed the confidentiality designations in connection with the deposition of John Iozzia. It is Plaintiffs' position that these designations are improper, as none of the documents or testimony rises to the level requiring confidentiality such as highly proprietary/trade secret information, such that ZHP would suffer significant harm if the information were to be public. In this context, as recognized in Judge Schneider's decision addressing Torrent's over-designation of documents, there is a high bar to be met and these documents and the identified testimony does not reach that level. Plaintiffs hope that Defendants will more carefully consider the use of these designations going forward.

Please confirm whether or to what extent you will de-designate the designated documents and testimony, or wish to discuss, pursuant to the Protective Order.

Thank you,

Adam Slater

From: Hill, Coleen W. <CWHill@duanemorris.com>

Sent: Friday, February 19, 2021 6:58 PM

To: 'KMartello@golkow.com' <KMartello@golkow.com>

Cc: 'Production@golkow.com' <Production@golkow.com>; 'Finals@golkow.com'

<Finals@golkow.com>; Priselac, Jessica <JPriselac@duanemorris.com>; Goldberg, Seth A.

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Subject: RE: John C. Iozzia - 01.20.21 - Valsartan, Losartan, and Irbesartan Products Liability Litigation MDL No. 2875 (FINAL Transcript & Exhibits)

Good evening,

Shortly you will receive, via our firm's secure file delivery system, Mr. John Iozzia's signature page and Errata sheet for his final deposition transcript. Also, pursuant to the Fact Witness Deposition Protocol (CMO No. 20, ECF No. 632) and the Confidentiality and Protective Order (ECF No. 139)

("Protective Order") entered in the above-captioned action, attached please find the confidentiality designations for the John Iozzia deposition transcript and exhibits.

Further, pursuant to Paragraph 18 of the Protective Order, the ZHP Parties hereby re-designate ZHP-9, ZHP-14, ZHP-36, and ZHP-43 as RESTRICTED CONFIDENTIAL INFORMATION. The ZHP Parties will be producing the re-designated documents in accordance with Paragraph 18 of the Protective Order.

For Golkow's purposes, we have affixed the legend "RESTRICTED CONFIDENTIAL INFORMATION" to marked ZHP-9, ZHP-14, ZHP-36, and ZHP-43 (copies sent via Biscom). We have also affixed the legend "RESTRICTED CONFIDENTIAL INFORMATION" to marked ZHP-5, ZHP-6, and ZHP-7 (copies sent via Biscom); those documents were used during the deposition in their native form and therefore did not reflect their confidentiality designation.

Golkow, please let us know if you need us to follow some other process for marking these exhibits with their confidentiality designation.

Thank you and have a nice weekend,
Coleen

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From: Production_glkw <Production@golkow.com>

Sent: Tuesday, January 26, 2021 1:07 PM

To: Priselac, Jessica <JPriselac@duanemorris.com>; Hill, Coleen W. <CWHill@duanemorris.com>; Schwartz, Barbara <BASchwartz@duanemorris.com>; Reeder, Nathan B. <NBReeder@duanemorris.com>

Cc: Finals <Finals@golkow.com>

Subject: John C. Iozzia - 01.20.21 - Valsartan, Losartan, and Irbesartan Products Liability Litigation MDL No. 2875 (FINAL Transcript & Exhibits)

Please find attached the FINAL e-transcript and PDF bundle transcript of John C. Iozzia .

Please use the following link for access to the exhibits: <https://golkowanywhere.sharefile.com/d-s0c81569c33514b1f8498d80a5a457a0a>

If we can be of any further assistance in this matter, please do not hesitate to contact us.

Thank you,

Kristie Martello

Supervisor of Case Management

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Philadelphia, Pennsylvania 19103

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